

# GIBSON DUNN

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January 7, 2019

VIA ECF

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger, et al.*, Case No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I write as counsel for Chevron Corporation (“Chevron”) to provide the Court with additional information regarding Chevron’s proposed alternative neutral forensic expert pursuant to this Court’s November 29, 2018 order. Dkt. 2137. In that order, the Court asked Chevron to advise the Court whether “LIFARS, LLC, is or has been retained by Chevron Corporation or Gibson Dunn in any matter, related or otherwise and, if it now is retained, the general nature of the current retention.” In response to the Court’s request, I can advise the Court that LIFARS has not been retained in any matter by Chevron Corporation. LIFARS performed discrete consulting work for Gibson Dunn with respect to an unrelated matter, for a client other than Chevron Corporation, handled by different attorneys at the firm; but that work is not ongoing. LIFARS is not otherwise retained by Gibson Dunn in relation to any matter.

As always, we appreciate Your Honor’s consideration.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All Counsel of Record via ECF